

Comments on Fourth Notice of Proposed Rulemaking  
Chapter 5 of Title 24  
District of Columbia Municipal Regulations  
Submitted by the Golden Triangle Business Improvement District  
April 8, 2013

**1. Amend Section 534.6,** which currently states, “The DCRA Director shall propose the following general areas to be reviewed by the DDOT Director for designation as MRV locations...”

**Comment:**The “general areas” should be more defined here like they are in 535.3 (e.g. Constitution Avenue NE/NW between 23rd Street, NW, and 2nd Street, NE).

**2. Amend Section 542.3,**which currently states, “A vendor subject to a temporary relocation shall be relocated by the DCRA Director to the closest available location that is deemed allowable for vending.”

**Comment:**Add “in accordance with §525.1”. The temporary locations should be in accordance with the same regulations for permanent locations and shall be made available to the public on the DCRA website.

**3. Section 570**

**Comment:** Section 570 is unclear, incomplete and faulty.

- Section 570.5 (b) does not include a management plan with criteria that would show an organization’s capacity to manage the zone.
- Section 570.12 does not provide adequate guidance on how and by whom a Vending Development Zone would be reviewed.
- There is no defined renewal period for a VDZ. It would be important to have a regular review process to ensure the VDZ is meeting its goals and the city’s regulations.